

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JASON DOHERTY	:	
	:	
Plaintiff,	:	
	:	18-cv-10898 (NSR)
- against -	:	
	:	
PATRICIA BICE, individually and as Dean of	:	<b>NOTICE OF MOTION</b>
Student Affairs for Purchase College, State	:	<b>TO DISMISS</b>
University of New York; JARED STAMMER,	:	
individually and as Associate Dean for Student	:	
Affairs for Purchase College, State University of	:	
New York; and QUI QUI BALASCIO, individually	:	
and as Associate Dean for Student Affairs for	:	
Purchase College, State University of New York,	:	
	:	
Defendants.	:	
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**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law, defendants PATRICIA BICE, QUI QUI BALASCIO, and JARED STAMMER (“Defendants”), by their attorney, LETITIA JAMES, Attorney General of the State of New York, hereby move for an Order pursuant to Rule 12(b) (1) and (6) of the Federal Rules of Civil Procedure, dismissing Plaintiff’s claims against Defendants, and for such further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, in support of their motion to dismiss, Defendants shall rely upon the Declaration of Alyssa Anzalone-Newman, sworn to October 4, 2019; Exhibit 1 to the Declaration of Alyssa Anzalone-Newman; the Declaration of Jared Stammer, sworn to October 4, 2019; the Memorandum of Law in Support of Defendants’ Motion to Dismiss the Complaint, dated October 4, 2019, and all other pleadings and papers herein.

Dated: New York, New York  
October 4, 2019

LETITIA JAMES  
Attorney General of the  
State of New York  
*Attorney for Defendants*  
By:

/s/  
ALYSSA ANZALONE-NEWMAN  
Assistant Attorney General  
28 Liberty Street  
New York, New York 10005  
(212) 416-8874